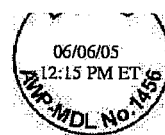


Exhibit B



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

NOTICE OF DEPOSITION OF ASTRAZENECA
PURSUANT TO FED. R. CIV. P. 30(b)(6)

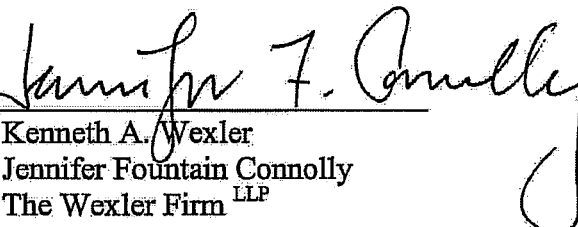
TO: ALL COUNSEL OF RECORD VIA VERILAW:

PLEASE TAKE NOTICE that the undersigned attorneys for Plaintiffs shall take the deposition upon oral examination of AstraZeneca pursuant to Federal Rule of Civil Procedure 30(b)(6) and will record them by stenographic and/or sound and visual means. The deposition will be take place as follows. You are invited to attend and participate.

| Deponent | Date | TIME | Location |
|-------------|--------------|-----------|--|
| AstraZeneca | July 6, 2005 | 9:30 a.m. | Morris, Nichols, Arsht & Tunnell 1201 N. Market St., 18 th Floor Wilmington, Delaware 19899 |

In accordance with Fed. R. Civ. P. 30(b)(6), the deponent is advised of its duty to designate one or more of its officers, directors, or other persons to testify on its behalf with respect to the matters known or reasonably available to the deponent and referred to in the annexed Exhibit A – Schedule of Topics.

Respectfully submitted,

By 
Kenneth A. Wexler
Jennifer Fountain Connolly
The Wexler Firm ^{LLP}
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Chicago, IL 60602
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efforts, including, but not limited to, documents now in the possession, custody or control of AstraZeneca, its merged or acquired predecessors, its former and present directors, officers, counsel, agents, employees and/or persons acting on its behalf.

3. "AstraZeneca" means AstraZeneca Pharmaceuticals L.P., AstraZeneca US, and Zeneca, Inc., and any of their subsidiaries, divisions, affiliates, officers, directors, employees or agents, including, but not limited to, attorneys and accountants.

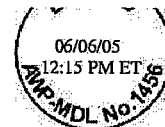
RELEVANT TIME PERIOD

The relevant time period for the topics below is January 1, 1991 to the present.

TOPICS

Please designate a witness or witnesses with knowledge of:

1. All persons responsible for or in any way involved in preparing, revising, or reviewing AstraZeneca's policies, procedures, practices, and standards for the training or education of its sales representatives who represent AstraZeneca with regard to AWPIDs.
2. AstraZeneca's policies, procedures, practices, and standards for the training or education of its sales representatives who represent AstraZeneca with regard to AWPIDs.
3. All documents used in the training or education of sales representatives who represent AstraZeneca with regard to AWPIDs...
4. The content and frequency of the training or education of sales representatives who represent AstraZeneca with regard to AWPIDs.
5. AstraZeneca's policies, procedures, practices and standards for the management of its sales representatives who represent AstraZeneca with regard to AWPIDs, including but not limited to:
 - a) The evaluation or review of sales representatives who represent AstraZeneca with regard to AWPIDs;



- b) The compensation of sales representatives who represent AstraZeneca with regard to AWPIDs;
- c) Any incentives or rewards offered or awarded to sales representatives who represent AstraZeneca with regard to AWPIDs and the identity of any persons who received those incentives or awards;
- d) The promotion, advancement, demotion, or discipline of sales representatives who represent AstraZeneca with regard to AWPIDs;
- e) All policies, procedures, practices or standards to which sales representatives who represent AstraZeneca are subject relating to the marketing, pricing, sale, or contracting of AWPIDs; and
- f) Any inquiries or investigations made by AstraZeneca of any violation of any policy, procedure, practice, or standard identified in response to subparagraph (e) of any sales representatives who represent AstraZeneca with regard to AWPIDs.

6. All documents referring, referencing, or relating to Topics 1-2 and 4-5 above.

DOCUMENT REQUESTS

Pursuant to Federal Rule of Civil Procedure 34, subject to the Definitions, Rules of Construction, and Instructions set forth in Plaintiffs' Omnibus Requests for Production and Interrogatories to Defendants (e-served on March 31, 2004) (the "Omnibus Requests"), and to the extent the documents have not already been produced, plaintiffs request that AstraZeneca respond to the following requests for production of documents by June 30, 2005.

1. All documents referring, referencing, or relating to the organization or organizations responsible for the education or training of AstraZeneca sales representatives and the persons within those organizations, including but not limited to, organizational charts.



2. All documents referring, referencing, or relating to AstraZeneca's policies, procedures, practices, and standards for the training or education of its sales representatives who represent AstraZeneca with regard to AWPIDs.

3. All documents used in the training or education of sales representatives who represent AstraZeneca with regard to AWPIDs.

4. All documents referring, referencing, or relating to any inquiries or investigations made by AstraZeneca of any violation of any policy, procedure, practice to which sales representatives who represent AstraZeneca are subject relating to the marketing, pricing, sale, or contracting of AWPIDs.

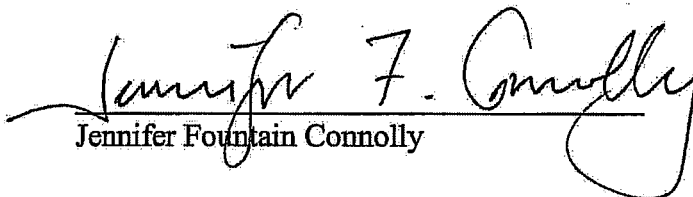


CERTIFICATE OF SERVICE BY VERILAW

Docket No. MDL 1456

I, Jennifer Fountain Connolly, hereby certify that I am one of plaintiffs' attorneys and that, on June 6, 2005, I caused copies of **NOTICE OF DEPOSITION OF ASTRAZENECA PURSUANT TO FED. R. CIV. P. 30(b)(6)** to be served on all counsel of record by causing same to be posted electronically via Verilaw.

Dated: June 6, 2005


Jennifer Fountain Connolly